

## Reactor Oversight Process Problem Identification and Resolution Working Group Charter – PHASE I

### I. BACKGROUND

Reactor Oversight Process (ROP) Enhancement Project (EP) Enclosure 6 ([ML14017A391](#)), championed by Michael L. Scott, Region I, and released to the public on April 9, 2014, recommended enhancements associated with Baseline Inspection Procedure (IP) 71152, “[Problem Identification and Resolution.](#)” The recommended enhancements derived from the [Assessment of IP 71152](#) (internal use only) by the IP owner/lead and proposed Problem Identification and Resolution Working Group (PIRWG) chairperson, Ross Telson, in June 19, 2013. Key Branch Chief, Ray J. Powell, chaired an informal PIRWG aimed at addressing these recommended enhancements. It was noted that the following recommendations involved enhancements to IP 71152 (and possibly Inspection Manual Chapter (IMC) 0308 bases), involved both assessment and inspection, and would require additional development before implementation:

- Clarify and expand inspection guidance and improve focus on inspection of corrective action program implementation.
- Improve guidance on how to assess a licensee’s corrective action program and how to incorporate the team inspection outcome into the overall licensee assessment.
- Resolve differences between the Problem Identification and Resolution (PI&R) inspection bases, as listed in IMC 0308 and IP 71152.

A more detailed explanation of the above recommendations can be found in the Analysis section of ROP EP Enclosure 6. The recommendations above were translated into the following three ROP Tracker Action Items and assigned, on or about June 9, 2014, to Key Branch Chief, Ray J. Powell (and, indirectly, to the unchartered informal PIRWG he chaired). The tasking and status of these items is shown below:

- [Item 1](#): Recommended changes to the inspection process of IP 71152 include clarification/ expansion of inspection guidance and focusing the procedure on inspection of corrective action program implementation.

This item was closed following a [February 26, 2015, revision of IP 71152](#) but may warrant further action.

- [Item 2](#): Recommended changes to the assessment process of IP 71152 include improving procedural guidance on how to assess a licensee’s corrective action program and incorporating the outcome of the team inspection into the overall assessment of the licensee.

This item is currently open with a projected completion date of 1/1/2016 which needs to be updated.

- [Item 3](#): Clear up differences between the bases for the PI&R inspection, as listed in IMC 0308, and the actual inspection procedure.

This item is recorded as closed following a February 2016 revision to IP 71152 but may warrant further action.

A revised Item 2 due date of 7/1/2017 should accommodate a “Phased” approach in which this PIRWG Phase 1 charter will focus tasking to portions of Items 1, 2, and 3 to (a) clarify and expand inspection governance to focus IP 71152 on inspection of licensee corrective action program implementation, (b) translate inspection results into a licensee PI&R program assessment, and (c) ensure alignment between the bases and governance for PI&R inspection and assessment.

Future (a) incorporation of the PI&R assessment into an overall licensee assessment and (b) determination of how and when to apply that assessment will be deferred to Phase 3 following completion of Phase 1 and a “Pilot” Phase 2 during which Phase 1 tasking will be implemented, assessed, and adjusted as necessary to support Phase 3.

The fundamental issue reflected above relates to the fact that, unlike all other baseline IPs which seek to augment performance indicators through performance-based risk-informed sample inspection which feeds into periodic action matrix assessment, IP 71152 and, in particular, IP 71152B (the Biennial PI&R Team Inspection) seeks to inspect and assess licensee PI&R programs.

## II. PURPOSE

The formation of a PIRWG is necessary to address programmatic issues associated with the ROP. This PIRWG Phase 1 charter focuses specifically on tasking portions of Items 1, 2, and 3 to (a) clarify and expand inspection governance to focus IP 71152 on inspection of licensee corrective action program implementation, (b) translate inspection results into a licensee PI&R program assessment, and (c) ensure alignment between the bases and governance for PI&R inspection and assessment.

In completing the above tasking, the PIRWG will develop the necessary bases, tools and governance, training materials, qualification standards, and self-assessment aids in a manner consistent with (a) a fundamental reactor inspection and assessment process goal to establish and maintain confidence that each licensee is detecting and correcting problems in a manner that limits the risk to members of the public<sup>1</sup>, (b) Commission direction to emphasize the importance of a good corrective action program<sup>2</sup>, (c) principle ROP objectives to provide tools for inspecting and assessing licensee performance in a manner that is more risk-informed, objective, predictable, and understandable<sup>3</sup>.

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<sup>1</sup> [IMC 0308 Reactor Oversight Process Basis Document, 06.05 Cross-Cutting Issues ...](#)

<sup>2</sup> SRM for SECY-05-0070, dated June 30, 2005

<sup>3</sup> IMC 0308 Reactor Oversight Process Basis Document, 06.01 Introduction

### **III. DESIRED OUTCOME**

To achieve its purpose, the PIRWG will engage internal and external stakeholders to develop and deliver enhanced PI&R inspection and assessment tools, and revise IP 71152 and associated bases. The PIRWG will prepare and deliver presentations to promote stakeholder understanding and consensus and prepare and deliver training to U.S. Nuclear Regulatory Commission (NRC) inspectors, staff, and management.

### **IV. TASKING**

The PIRWG shall accomplish the following in a manner congruent with the stated Purpose, Desired Outcome, and Milestones:

- a. Engage NRC and Industry experts and stakeholders to identify, develop, and to generate consensus on appropriate tools to enhance licensee PI&R process inspection and assessment;
- b. Revise IP 71152, as appropriate, to articulate how, when, and why enhanced PI&R process tools are to be implemented;
- c. Address pending ROP Feedback Forms during IP 71152 revision, consistent with the purpose of the PIRWG, applicable ROP bases, and other applicable governance documents (See Attachment 1, IP 71152 ROP Feedback Forms);
- d. Coordinate with other IP/IMC leads, as appropriate, to facilitate any necessary complimentary revisions to their ROP governance and basis documents to ensure all impacted governance documents are aligned with the IP 71152 enhancements;
- e. Promote NRC and Industry stakeholder consensus by preparing and delivering presentation materials at appropriate times during the course of the project and by anticipating and addressing stakeholder questions and areas of potential concern;
- f. Work closely with training and qualification stakeholders to facilitate development and implementation of necessary training and qualification program enhancements;
- g. Work closely with ROP self- and independent assessment stakeholders to prepare tools to support an implementation pilot period (Phase II);
- h. Suggest potential applications for consideration during Phase III (Application of PI&R inspection / assessment insights).

## V. MILESTONES

<b>Activity (Within Scope of Charter)</b>	<b>Start Date</b>	<b>Dur. (Wks.)</b>	<b>Compl. Date</b>
Formalize PIRWG, Chair Turnover, Solicit Members, Develop and Approve Charter, Publish to Public	9/1/2015	10	11/13/2015
Brief and Engage Internal Stakeholders - Initial	11/2/2015	1	11/13/2015
<b>Brief and Engage Public at the ROP Public Meeting</b>	<b>11/17/2015</b>	<b>0</b>	<b>11/17/2015</b>
Develop Enhanced PI&R and Generate Consensus	11/2/2015	20	3/18/2016
Integrate Enhanced PI&R into Impacted IPs and IMCs	2/5/2016	8	4/1/2016
<b>PI&amp;R-Enhanced IP/IMC Comment Period</b>	<b>4/1/2016</b>	<b>4</b>	<b>5/2/2016</b>
Resolve Comments & Publish PI&R-Enhanced IPs/IMCs	5/1/2016	4	6/1/2016
Brief/Train All Stakeholders on Enhanced PI&R	6/1/2016	4	7/1/2016
<b>Effective Date of Revised IPs &amp; IMCs (End Phase I)</b>	<b>7/1/2016</b>	<b>0</b>	<b>7/1/2016</b>
<b>Future Activities (Beyond Current Charter)</b>	<b>Start Date</b>	<b>Dur. (Wks.)</b>	<b>Compl. Date</b>
Pilot Enhanced PI&R (Phase II)	7/1/2016	52	7/1/2017
Evaluate Pilot and Integrate Pilot-Based lessons learned Enhancements	7/1/2017	26	1/1/2018
Effective Date of Post-Pilot Enhanced IPs and IMCs	1/1/2018	0	1/1/2018
Incorporate PI&R assessment into an overall licensee assessment, determine how and when to apply that assessment, implement, pilot, and adjust application.	1/1/2018	52	1/1/2019

## VI. CHAIR FUNCTIONS

- Schedule and lead meetings
- Ensure minutes are prepared and action item tracking
- Circulate draft products to members for review
- Notify responsible managers of Charter modifications.
- Ensure that the processes and work products are consistent with the Reactor Inspection Branch and Performance Assessment Branch Working Group Process (Branch Operating Instruction 011), and IMC 0040.

**VII. PI&R WG MEMBERSHIP**

<a href="#">Ross Telson</a> , NRR/DIRS/IRIB (Chair).....	(301) 415-2256
<a href="#">Aron Lewin</a> , NRR/DIRS/IRIB .....	(301) 415-2259
<a href="#">Zachary Hollcraft</a> (NRR/DIRS/IPAB) .....	(301) 415-3024
<a href="#">Bethany Cecere</a> (NSIR/DPR/IRIB Rotational Assignee) .....	(301) 415-2186
<a href="#">Marc Ferdas</a> (Region I/TSB Chief).....	(610) 337-5022
<a href="#">Leonard Cline</a> (Region I/TSB).....	(610) 337-5373
<a href="#">Anthony Masters</a> (Region II/TSB Chief) .....	(404) 997-4465
<a href="#">Ryan Taylor</a> (Region II/TSB) .....	(404) 997-4630
<a href="#">AnnMarie Stone</a> (Region III/TSB Chief) .....	(630) 829-9729
<a href="#">John “Jack” Rutkowski</a> (Region III/ Senior Project Engineer).....	(630) 829-9730
<a href="#">Eric Ruesch</a> (RIV/DRS/TSS Team Leader).....	(817) 200-1126

**VIII. DURATION**

The PIRWG will remain in place through the July 1, 2016, completion of Phase I described in this charter (see Purpose, Desired Outcome, Tasking, and Milestones above).

**IX. LEVEL OF EFFORT**

Periodic meetings (or teleconferences) of the working group will be coordinated approximately bi-monthly by the chair. These meetings may be slightly more frequent during project startup and wrap-up. In addition, one or two public meetings may be scheduled. These meetings may require travel to either Headquarters or to one of the regional offices. Active participation and meeting attendance is expected of all members.

**X. CHARTER MODIFICATIONS**

The PIRWG will obtain concurrence from the Division of Inspection and Regional Support and regional management prior to making substantive changes to charter tasking or desired outcome.

**XI. REFERENCES**

1. [Branch Operating Instruction \(BOI\) 011 "Working Group Process"](#)
2. [IP 71152, "Problem Identification and Resolution"](#)
3. [IMC 0308 "Reactor Oversight Process Basis Document"](#)
4. [IMC 0308 Att. 2, "Technical Basis for Inspection Program"](#) – Figure 37 (See Att. 1)
5. [IMC 2515 App A, "Risk-Informed Baseline Inspection Program"](#)
6. [Appendix B to Part 50—Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants](#) (Criterion XVI. Corrective Action)
7. ROP Enhancement Project Enclosure 6 PI&R Recommendations ([ML14017A391](#))
8. [IFR 2011-010](#) – Review Contribution of Corrective Action Program Weaknesses to Greater-than-Green Findings
9. [IFR 2012-010](#) – Operating Experience Analysis of Significant Events 2006-2012
10. [2011 OpE Analysis Summary](#)
11. [Notable OpE July 2011](#)
12. [Fall 2012 OpE Overview and Analysis Report](#)
13. [Assessment of IP 71152](#), June 19, 2013 (internal use only)
14. ROP Independent Assessment ([ML14035A571](#))
15. Disposition of 2013 Reactor Oversight Process Independent Assessment Recommendations and Suggestions ([ML15264A171](#))
16. [CAP Effectiveness](#) (Notable Ope. Report Final 1H2011, [CAP Technical Review](#))
17. [Fall 2012 Operating Experience Overview and Analysis Report](#)

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ADAMS Accession No.: ML15290A004; \* - e-mail concurrence

OFFICE	NRR/DIRS*	RI/DRP*	RII/DRP*	RIII/DRP*	RIV/DRS*
NAME	SMorris	MScott	JMunday	PLouden	AVegel
DATE	12/15/2015	12/15/2015	12/15/2015	12/15/2015	12/17/2015

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### ROP TRACKER ASSIGNMENTS

ROP Enhancement Project Enclosure 6 PI&R Recommendations ([ML14017A391](#))

Input Source	Input #	Input	Status	Projected Completion Date
<a href="#">Recommendation 1 of Baseline Inspection Program (BIP) Enhancement Project</a>	Enclosure 6 "Problem Identification and Resolution" - Recommendation 1	Recommended changes to the inspection process of Inspection Procedure (IP) 71152 include clarification/ expansion of inspection guidance and focusing the procedure on inspection of corrective action program implementation.	Closed	01/01/2015
<a href="#">Recommendation 2 of BIP Enhancement Project</a>	Enclosure 6 "Problem Identification and Resolution" - Recommendation 2	Recommended changes to the assessment process of 71152 include improving procedural guidance on how to assess a licensee's corrective action program and incorporating the outcome of the team inspection into the overall assessment of the plant.	Open	01/01/2016
<a href="#">Recommendation 3 of BIP Enhancement Project</a>	Enclosure 6 "Problem Identification and Resolution" - Recommendation 3	Clear up differences between the bases for the Problem Identification and Resolution inspection, as listed in Inspection Manual Chapter 0308, and the actual IP.	Closed	01/01/2015

**ROP INDEPENDENT ASSESSMENT AND DISPOSITION**  
 ([ML14035A571](#) and [ML15264A171](#))

Issue	Recommendation	Accepted Disposition in SECY-14-0047	Additional Action Taken by NRR/DIRS Staff
<b>Item 1</b>			
<p>Licensee requests for an extended period of time to conduct cause evaluations and plan corrective actions in advance of Supplemental Inspections for Column 4 of the Reactor Oversight Process (ROP) Action Matrix could potentially delay U.S Nuclear Regulatory Commission (NRC) reviews to verify the adequacy of the licensee's corrective action program while operations continue.</p>	<p>Clarify expectations for the timing of supplemental inspections for Column 4 of the ROP Action Matrix, or portions thereof, to ensure that the NRC's assessment of continued operation and consideration of additional regulatory actions are completed in a timely manner. (Section 4.1)</p>	<p>Staff has developed several options to address timeliness of supplemental inspections under the scope of the ROP enhancement project. In practice, staff already completes an initial assessment under IP 95003 to give staff assurance that a licensee in Column 4 is operating safely and to decide whether additional regulatory actions are necessary. Staff can revise IP 95003 or IMC 0305 to formalize this practice.</p>	<p>The staff revised IMC 0305 on April 9, 2015, to incorporate guidance in Section 11.04.i for regions to consider a phased approach for conducting the IP 95003 supplemental inspection to inform decision-makers whether continued operation of the facility is acceptable and to decide whether additional regulatory actions are necessary to arrest declining licensee performance. A complimentary proposed revision to IP 95003 was issued for comment on August 26, 2015. The final revision is expected to be published before the end of October to become effective January 1, 2016.</p>

Item 2			
<p>The ROP assessment process does not require a licensee to demonstrate improved performance (i.e., adequate and lasting corrective actions) before a plant is moved from a “higher” Action Matrix column back to the Licensee Response column. This can lead to abrupt swings in the Action Matrix characterization of a plant’s performance, might appear disjointed to external stakeholders, and can result in unnecessary resource burdens for the NRC and licensees.</p>	<p>Consider including additional measures in the ROP to minimize abrupt changes in the Action Matrix characterization of plant performance caused by mechanistic relaxation of oversight based on the passage of time and completion of NRC inspections. (Section 4.2)</p>	<p>Staff is currently evaluating potential ROP Action Matrix improvements under the ROP enhancement project, specifically the appropriateness of criteria for moving a licensee in the Action Matrix. This recommendation has been added to the scope of the enhancement project. The IMC 0305 working group is evaluating the recommendation and considering adding guidance to IMC 0305 to require licensees to demonstrate improved performance before moving back to the Licensee Response column, or to potentially use a phased approach to moving licensees in the Action Matrix.</p>	<p>The staff rejected the recommendation for several reasons:</p> <ul style="list-style-type: none"> <li>• The assessment process is performance based. If a licensee is in Column 3, returns to Column 1, and then finds itself back in Column 2 or 3 within the next year, there can be several reasons for that. Poor performance invites additional NRC inspection. Licensees who address their performance issues to the satisfaction of NRC inspectors should be allowed to return to Column 1.</li> <li>• It would be a challenge to allow some licensees to close out supplemental inspections to planned corrective actions, while requiring others to actually implement their corrective actions before closure. Some licensees have more effective CAPs than others, but there are no criteria to measure program effectiveness. This would be highly subjective, lack predictability, and it would be difficult to explain to the licensees and the public. Licensees who don’t implement their planned corrective actions should expect to move back to a higher column with resultant increased oversight.</li> <li>• Not all licensees bounce back and forth in the Action Matrix due to ineffective corrective actions from the first escalated enforcement. Sometimes they have a completely different problem which drives them back to the right in the Action Matrix.</li> <li>• There are no objective criteria for determining when a licensee’s corrective actions could be considered “effective” or “sustained.”</li> </ul> <p>A gradual return to Column 1 is problematic in Action Matrix space. A licensee who moves out of Column 3 would only be allowed to do so after successfully completing a 95002 and the associated findings closed or PIs returned to green. If they then moved to Column 2 for a period of time, the regulatory action associated with that move would be to do a 95001 inspection, which would be superfluous since they just completed a 95002. This would require a change to the criteria for entry into Column 2, since we would see licensees with no greater-than-green inputs in Column 2. Changing the criteria for a licensee to transition to Column 2 would require a Commission decision.</p>

**Item 3**

<p>Generic issues are often considered “resolved” by licensee commitments to programmatic changes and future actions. After initial NRC reviews, the inspection program does not generally include explicit activities to confirm continued licensee implementation over time.</p>	<p>Include a risk-informed periodic review of licensee programs or actions implemented to address generic issues to enhance the agency’s assurance that these measures continue to be effectively implemented. (Section 4.3)</p>	<p>This recommendation was examined under the ROP enhancement project - baseline inspection program review. Specifically, recommendations were made to implement an IP operating experience (OpE) update process which would provide a method for linking recent OpE directly to individual IPs. The process would help to inform the selection of inspection samples and provide inspectors with past examples, as well as guidance for probing potential issues based on current OpE analysis. This would also include consideration of licensee responses to relevant generic communications and generic issues, to be reviewed during related inspections, e.g., Problem Identification and Resolution inspection.</p>	<p>The staff developed a new inspection procedure titled, “Design Bases Inspection (Programs)” IP 71111.21P (ML15176A433) to assess the effectiveness of the licensee’s implementation of their engineering programs. The staff plans to perform this inspection in a pilot program at selected sites during calendar year 2015 and 2016. First licensee engineering program selected for review will be the equipment qualification program. The inspection procedure, IP 71111.21P will be revised based on the lessons learned from the pilot inspections and periodic review of licensee programs will become part of the baseline inspection program starting in calendar year 2017.</p>
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**IP 71152 ROP FEEDBACK FORMS**

(From [Open Feedback Forms](#) As Of October 1, 2015 – Internal Use Only)

Name	Related Project	Created	Submitter	Region
<a href="#">71152-1718.docx</a>		10/28/11	Juan Ayala	RI
<a href="#">71152-1833.docx</a>		11/1/12	Necota Staples	RII
<a href="#">71152-1834.docx</a>		11/1/12	Necota Staples	RII
<a href="#">71152-1835.docx</a>		11/1/12	Necota Staples	RII
<a href="#">71152-1837.docx</a>		11/1/12	Necota Staples	RII
<a href="#">71152-1841.docx</a>		11/15/12	Eric Ruesch	RIV
<a href="#">71152-1842.docx</a>		11/15/12	Eric Ruesch	RIV
<a href="#">71152-1870.docx</a>		2/21/13	Nicole Warnek	RI
<a href="#">71152-1939.docx</a>		12/9/13	Rebecca Sigmon	HQ
<a href="#">71152-1946.docx</a>		1/27/15	Stacy Smith	HQ
<a href="#">71152-1968.docx</a>	2013 Brown's Ferry Lessons Learned	3/4/14	Rich Skokowski	RIII
<a href="#">71152-1984.docx</a>		3/21/14	Briana Bollinger	RI
<a href="#">71152-1987.docx</a>	2014 Ft. Calhoun Lessons Learned	3/24/14	Briana Bollinger	RI
<a href="#">71152-1988.docx</a>	2014 Ft. Calhoun Lessons Learned	3/24/14	Briana Bollinger	RI
<a href="#">71152-1998.docx</a>	2014 Ft. Calhoun Lessons Learned	3/24/14	Briana Bollinger	RI
<a href="#">71152-2015.docx</a>	2014 ROP Enhancement Project	3/28/14	Carey Bickett	RI
<a href="#">71152-2017.docx</a>	2014 ROP Enhancement Project	3/31/14	Carey Bickett	RI
<a href="#">71152-2018.docx</a>	2014 ROP Enhancement Project	3/31/14	Carey Bickett	RI
<a href="#">71152-2020.docx</a>	2014 ROP Enhancement Project	3/31/14	Carey Bickett	RI
<a href="#">71152-2021.docx</a>	2014 ROP Enhancement Project	3/31/14	Carey Bickett	RI
<a href="#">71152-2023.docx</a>	2014 ROP Enhancement Project	3/31/14	Carey Bickett	RI
<a href="#">71152-2024.docx</a>	2014 ROP Enhancement Project	3/31/14	Carey Bickett	RI
<a href="#">71152-2025.docx</a>	2014 ROP Enhancement Project	3/31/14	Carey Bickett	RI
<a href="#">71152-2068.docx</a>		7/11/14	Allyce Bolger	RI
<a href="#">71152-2155.docx</a>	all related 2153-2159	8/19/15	Chris Cauffman	HQ

**IP 71152 BASIS SUMMARY**  
 (From 10/16/06 [IMC 0308 Att. 2](#) Figure 37)

<b>Basis Summary Sheet</b>	
<b>Inspectable Area:</b> Identification and Resolution of Problems/Issues	
<b>Cornerstone(s):</b> All seven	<b>Inspection Procedure:</b> IP 71152
<p><b>Scope:</b> This item will verify that the licensee has an effective problem identification and resolution program. Problem identification and resolution refers to: (1) the deficiency reporting process; (2) licensee self-assessments; and (3) Quality Assurance audits. Additionally, in some plants each department may have its own problem identification and resolution program. The focus of the inspection is on the licensee's effectiveness in identifying, resolving and preventing risk significant problems.</p>	
<p><b>Basis:</b> The objective of this inspection is to ensure that the licensee effectively assesses performance to identify and correct situations that could impact the cornerstone objectives.</p> <p>An effective problem identification and resolution program is the primary means of reducing risk by correcting deficiencies involving people (i.e., training, knowledge and skills), processes (i.e., procedures and programs), and equipment (i.e., design and maintenance) before they manifest in a significant event affecting the health and safety of workers or the public. Industry experience indicates that licensees having an effective program for identifying and resolving problems also have a reduced frequency of events.</p> <p>The inspection should verify that: (1) the licensee's assessments of problems and issues were of sufficient scope to address the key attributes of the cornerstone; (2) the risk significance of the findings was properly assessed; (3) root cause analyses and corrective actions were timely and adequate to prevent recurrence; (4) industry and NRC generic issues were considered; (5) required reports to the Commission or input to a PI were made; and (6) the performance trend indicated by the sample set was consistent with the applicable PIs.</p> <p>Additional sampling of the licensee's performance assessment feedback loop is required if: (1) recurrent issues or highly risk significant findings were identified; (2) adequate corrective actions were not taken in response to a declining trend or performance above a PI threshold; or (3) the NRC or licensee assessment results indicate risk significant findings that should have been manifested in a negative PI trend.</p> <p>An observed discrepancy between PI data and NRC or licensee findings is indication that additional review of PRA assumptions, re-verification of applicable PIs and an assessment of changing risk may be required.</p>	
<p><b>Performance Indicators:</b> None of the established PIs cover this area. However, some insight may be obtained from the PIs developed for each cornerstone, which may reduce the overall inspection effort in this area.</p>	
<p><b>Significant Changes in Scope or Basis:</b></p> <p>December 2001 - Decreased the frequency of the inspection from annual to biennial and added the inspection of three to six PI&amp;R samples per year. Based on experience and lessons learned during initial implementation, it was determined that an annual team inspection into PI&amp;R was not necessary to gain insights into licensee performance. This was due to the other methods available in the inspection program to assess PI&amp;R more frequently and the fact that it is not likely that significant PI&amp;R program degradations would occur from one year to the next.</p> <p>September 2003 - revised to incorporate recommendations made by the PI&amp;R focus group to address several items from the Davis-Besse Lessons Learned Task Force. The changes include enhanced requirements regarding the routine PI&amp;R reviews conducted by resident inspectors, biennial reviews of longstanding issues, and biennial reviews of operating experience issues.</p>	

## ON THE IMPORTANCE OF EFFECTIVE PI&R PROGRAM INSPECTION, ASSESSMENT, AND INSIGHT APPLICATION

The importance of effective PI&R program inspection, assessment, and insight application is illustrated in Commission Policies, ROP Bases, and IP 71152 objectives:

- A fundamental reactor inspection and assessment process goal is to establish and maintain confidence that each licensee is detecting and correcting problems in a manner that limits the risk to members of the public<sup>4</sup>,
- Commission direction to emphasize the importance of a good corrective action program<sup>5</sup>,
- Effective PI&R program assessment can provide for early warning of potential performance issues that could result in crossing thresholds in the ROP Action Matrix<sup>6</sup>

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<sup>4</sup> [IMC 0308 Reactor Oversight Process Basis Document, 06.05 Cross-Cutting Issues ...](#)

<sup>5</sup> SRM for SECY-05-0070, dated June 30, 2005

<sup>6</sup> IP 71152 OBJECTIVE 01.01 “To provide for early warning of potential performance issues that could result in crossing thresholds in the ROP Action Matrix ...” dates at least back to the 9/8/2003 revision of IP 71152. This objective was removed in February 2015 pending integration of credible IP elements to support the objective.